

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

LINDA HAIR

V.

GOLDEN CORRAL CORPORATION

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C.A. NO. 2:05-CV-00350

JURY DEMAND

PLAINTIFF'S DESIGNATION OF EXPERT WITNESSES

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF TEXAS, CORPUS CHRISTI DIVISION:

COMES NOW Linda Hair and respectfully files and submits this her Plaintiff's First Designation of Expert Witnesses who have knowledge, relevant facts, or may be called t provide opinion testimony pursuant to Rules 702, 703, 704 and 705 of the Federal Rules of Civil Procedure. None of these persons have been retained pursuant to Rule 26(a)(2)(B).

The following medical providers may have knowledge of this matter. These providers, or their records custodians may testify as to usual and customary medical costs, reasonable and necessary treatments, diagnosis, prognosis, and treatment recommendations.

6. North Bay Hospital
1711 W. Wheeler Avenue
Aransas Pass, Texas 78336
361-758-8585

Dr. William Burgin, Jr.
Executive Medical Clinic
2601 Hospital Blvd., Suite 117
Corpus Christi, Texas 78405

Medical Imaging
5656 S. Staples, Suite 210

Medical Imaging
5656 S. Staples, Suite 210
Corpus Christi, Texas 78411
361-906-0969

Scott Humpal
c/o Humpal Physical Therapy
5026 Deepwood Circle
Corpus Christi, Texas 78415
361-854-2278

Samuel Hudson, M.D., P.A.
Coastal Bend Bone & Joint Clinic
2600 Lakeview Drive
Rockport, Texas 78382
361-729-4100

Radiology Associates
4404 Corona, Suite 200
Corpus Christi, Texas 78411
361-882-7432

Hawkins Chiropractic
2011 Highway 35
Rockport, Texas 78382
361-729-2225

Richard Carlson, M.D.
613 Elizabeth Street, Suite 809
Corpus Christi, Texas 78404
361-882-5056
A copy of his June 7, 2005 report is attached.

Spectrum Imaging
5309 Wurzbach Road, Suite 101
San Antonio, Texas 78238
877-674-3926

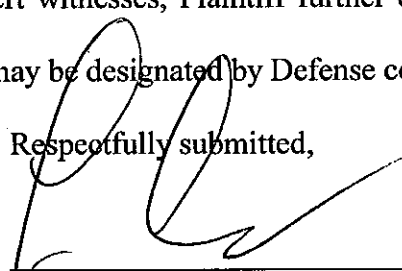
Miscellaneous:

Any other persons with knowledge of facts relevant to the disposition of this cause, whether or not identified hereinabove, and whether identified by Plaintiff, Defendants, or another witness herein.

In addition to the above listed expert witnesses, Plaintiff further designates any and all Expert Witnesses that have been or may be designated by Defense counsel.

Respectfully submitted,

By:



Les Cassidy
State Bar Number 03979270
Federal Identification 5931
814 Leopard Street
Corpus Christi, Texas 78401
(361) 887-2965 office
(361) 887-6521 fax

Attorney for Claimant, Linda Hair

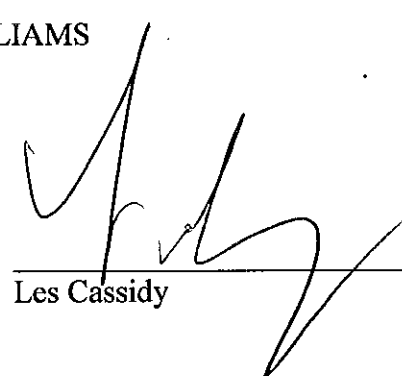
OF COUNSEL:

CASSIDY & RAUB, PLLC
814 Leopard Street
Corpus Christi, Texas 78401
361-887-2965
361-887-6521 - fax

CERTIFICATE OF SERVICE

I, Les Cassidy, hereby certify that a true and correct copy of the foregoing document was served, in the form and manner indicated below and in accordance with all applicable provisions of the Federal Rules of Civil Procedure, on this 5th day of May, 2006, upon:

Timothy McMurtrie
ROYSTON, RAYZOR, VICKERY & WILLIAMS
606 N. Carancahua, Suite 1700
Corpus Christi, Texas 78476



Les Cassidy

Richard Carlson, M.D.
613 Elizabeth St., Ste. 809
Corpus Christi, Texas 78404
Phone#: 361-882-5056
Fax#: 361-883-0480

June 7, 2005

Cassidy & Raub, PLLC
814 Leopard St.
Corpus Christi, Texas 78401

Re: Ms. Linda L. Hair
Date of Birth: January 9, 1940
Social Security#: 369-40-4661
Date of accident: February 20, 2004

Dear Attorney Raub,

Ms. Linda Hair was seen in the office for follow-up on April 12, 2005 and June 1, 2005. She was treated for injuries sustained on February 20, 2004 at the Golden Corral Restaurant.

Chief complaint: The patient is complaining of pain to the right knee. She states that she can't walk very long on it, the pain keeps her awake at night, it goes numb sometimes, pops, and swells.

History of present complaint: The patient states that on February 20, 2004 she fell at the Golden Corral Restaurant twisting her right knee. She immediately felt severe pain. On April 30, 2004 Ms. Hair had surgery consisting of a diagnostic arthroscopy and partial medial meniscectomy.

Allergies: None known by patient.

Physical examination: On examination of the right knee there was full range of motion with crepitus and pain. I noted medial joint line tenderness.

Linda Hair - June 7, 2005

X-rays and Imaging Studies:

1. MRI of the right knee without contrast performed on March 4, 2004: Radial tear involving the medial meniscus at it's junction of the anterior and posterior horns. Intact cruciate ligaments. Degenerative joint changes involving the medial compartment characterized by total cartilage loss and osteophyte formation. Subchondral marrow edema involving the medial tibial plateau and the medial femoral condyle, the tibial plateau, and the medial femoral condyle. There is also evidence of marrow edema subchondral cyst formation involving the tibial spine as described above. Posttraumatic marrow contusion is a consideration. Sprain injury involving the medial collateral ligament.
2. MRI of the right knee performed on May 17, 2005: Full thickness tear of the anterior cruciate ligament in its inferior aspect. Moderate joint effusion. Baker's cyst. Tear of the anterior horn of the medial meniscus. Osteoarthritic changes.

Diagnosis:

1. Post partial tear of the medial meniscus of the right knee
2. Sprain of the medial collateral ligament of the right knee
3. Aggravation of severe degenerative joint disease of the right knee
4. Tear of the anterior cruciate ligament of the right knee
5. Baker's Cyst of the right knee

Plan of Treatment: I recommend surgery for the tear of the right ACL and anterior horn of the medial meniscus. This surgical procedure should be performed by an Orthopedic Surgeon with a specialty in knee surgery. The complications associated with the patient's varicosities were explained to Ms. Hair. The ACL and medial meniscus tears of the right knee were traumatic in origin and were caused by the accident on February 20, 2004. The degenerative joint disease of the right knee was pre-existing but was aggravated by the accident on February 20, 2004. Ms. Hair suffered no symptoms prior to the accident of February 20, 2004. A prescription was given for Loritab. I will see the patient in the office for follow-up in approximately four weeks.

Linda Hair - June 7, 2005

Estimated Charges for the Surgical Procedure:

Surgery: \$5,000.00

Anesthesia: \$2500.00

Hospital: \$25,000.00

Thank you for allowing me to evaluate and treat Ms. Linda Hair and if you need any further information please let me know.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Carlson M.D.", written over the printed name.

Richard Carlson, M.D.
Orthopedic Surgeon

RC:kc

Dictated not read